

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**BRYAN ANTHONY REO**

Plaintiff,

v.

**LUDIVINE JOAN CLAUDIA REYNAUD**

Defendants.

**Case No. 1:22-cv-00510-JG**

**Hon. James S. Gwin**

**REO LAW, LLC**

Bryan Anthony Reo (#0097470)

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*Pro se Plaintiff*

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**PLAINTIFF BRYAN ANTHONY REO’S REPLY IN SUPPORT OF  
MOTION TO COMPEL DISCOVERY**

**(ORAL ARGUMENT REQUESTED)**

NOW COMES Bryan Anthony Reo (“Plaintiff”), *pro se*, and hereby propounds upon Defendant Ludivine Joan Claudia Reynaud (“Reynaud” or “Defendant”) and this Honorable Court, Plaintiff’s Reply in Support of Motion to Compel Discovery of Defendant Ludivine Joan Claudia Reynaud regarding Interrogatories.

Plaintiff still does not have contact information for all fact witnesses, even as Defendant Reynaud has finally begun to disclose at least the existence, and occasionally even the names/identities of her recently disclosed 30-40+ fact witnesses.

Defendant has admitted to discussing this case with Emmanuel Brun d'Aubogisnc after the case was filed, but she has still not provided his contact information.

Defendant has admitted to the existence of email chains with pornographic website personnel but has not provided/produced those email chains.

Defendant has not provided the names with contact information of the pornographic website personnel.

Defendant has not provided actual URL links linking to the actual content on the pornographic websites.

Plaintiff wishes the Court to note that this dispute is ongoing and unresolved.

Respectfully submitted,

/S/. BRYAN ANTHONY REO

Bryan Anthony Reo

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*Pro se Plaintiff*

**CERTIFICATE OF SERVICE**

I, Bryan Anthony Reo, affirm that I am a party to the above-captioned civil action, and on September 6, 2022, I submitted this Certificate of Service and Plaintiff Bryan Anthony Reo's Reply in Support of Motion to Compel Discovery the Court's Electronic Filing System, which should serve the same upon the attorneys of record for Defendant Ludivine Joan Claudia Reynaud.

/S/ BRYAN ANTHONY REO

Bryan Anthony Reo

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*Pro se Plaintiff*

Dated: September 6, 2022